

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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NOV 9 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
Implementation of the Subscriber Carrier )  
Selection Changes Provisions of the )  
Telecommunications Act of 1996 )  
)  
Qwest Corporation, All West )  
Communications, Inc., All West World )  
Connect, Carbon/Emery Telcom, Inc., )  
Central Telcom Services, Central Utah )  
Telephone, Inc., Emery Telcom, Hanksville )  
Telcom, Inc., Manti Long Distance, Manti )  
Telephone Company, Skyline Telecom, )  
UBET Telecom, Inc. and Uintah Basin Long )  
Distance Joint Petition for Waiver of )  
the Subscriber Carrier Selection Change )  
Provisions of the Telecommunications Act )  
of 1996 )

CC Docket No. 94-129

**JOINT PETITION FOR WAIVER OF QWEST CORPORATION, ALL  
WEST COMMUNICATIONS, INC., ALL WEST WORLD CONNECT,  
CARBON/EMERY TELCOM, INC., CENTRAL TELCOM SERVICES,  
CENTRAL UTAH TELEPHONE, INC., EMERY TELCOM,  
HANKSVILLE TELCOM, INC., MANTI LONG DISTANCE, MANTI  
TELEPHONE COMPANY, SKYLINE TELECOM, UBET TELECOM,  
INC. AND UINTAH BASIN LONG DISTANCE**

I. REQUEST FOR RELIEF

Qwest Corporation<sup>1</sup> ("Qwest"), All West Communications, Inc., All West  
World Connect, Carbon/Emery Telcom, Inc., Central Telcom Services, Central Utah  
Telephone, Inc., Emery Telcom, Hanksville Telcom, Inc., Manti Long Distance,

<sup>1</sup> On June 30, 2000, U S WEST, Inc., the parent and sole shareholder of U S WEST Communications, Inc., merged with and into Qwest Communications International Inc. Further, on July 6, 2000, U S WEST Communications, Inc. was renamed Qwest Corporation.

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Manti Telephone Company, Skyline Telecom, UBET Telecom, Inc. and Uintah Basin Long Distance (referred to hereinafter collectively as “Acquiring Companies”), pursuant to Section 1.3 of the Federal Communications Commission’s (“Commission”) rules,<sup>2</sup> respectfully request the Commission grant a limited waiver of the authorization and verification requirements of the Commission’s carrier-change rules, 47 C.F.R. Sections 64.1100 through 64.1190,<sup>3</sup> and relevant Orders,<sup>4</sup> to the extent necessary to permit the Acquiring Companies to be substituted as the local carrier for Qwest’s current customers for the twelve Utah exchanges they are purchasing. Approval of the transfer of these twelve exchanges to the Acquiring Companies, said approval having been requested of this Commission in October 2000,<sup>5</sup> would entail changing the current carrier of approximately 35,600 access lines.

As demonstrated herein, the rural exchange sales being undertaken between the Acquiring Companies and Qwest fully satisfy the special circumstances required

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<sup>2</sup> See 47 C.F.R. § 1.3.

<sup>3</sup> The Commission’s verification rules prohibit a telecommunications carrier from submitting a preferred carrier-change order unless certain criteria have been met. See 47 C.F.R. § 64.1150.

<sup>4</sup> See In the Matter of Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Changes of Consumers Long Distance Carriers, Second Report and Order and Further Notice of Proposed Rulemaking, 14 FCC Rcd. 1508 (1998), appeal in abeyance sub nom. MCI WorldCom, Inc. v. FCC, No. 99-1125 (D.C. Cir.).

<sup>5</sup> Expedited Joint Petition for Waivers (“Joint Petition”), CC Docket No. 96-45, filed October 6, 2000. The Commission publicly noticed the Joint Petition on October 18, 2000. Public Notice, DA 00-2349, rel. Oct. 18, 2000.

for a waiver of Commission rules, as stated in Wait Radio v. FCC.<sup>6</sup> Moreover, grant of the instant Petition will further serve the public interest.<sup>7</sup>

## II. BACKGROUND

In the Joint Petition, Qwest sought to delete twelve Utah exchanges containing approximately 35,600 access lines from its Utah study area.<sup>8</sup> The Acquiring Companies sought a waiver to add those approximately 35,600 access lines to their existing study areas.

Importantly, affected customers have been fully informed of the carrier changes associated with the transfer of these access lines and accounts. On November 3<sup>rd</sup> and 6<sup>th</sup>, 2000, notifications were sent to all customers in the area to advise of the sale of the customer base and the transfer of the customers from Qwest to the Acquiring Companies.<sup>9</sup> This notification advised customers of the impending service provider transfer and how that transfer would most likely affect

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<sup>6</sup> WAIT Radio v. FCC, 418 F.2d 1153 (D.C. Cir. 1969), cert. denied, 409 U.S. 1027 (1972).

<sup>7</sup> See Before the Public Service Commission of Utah, In the Matter of the Joint Application of U.S. West Communications, Inc., All West Communications, Inc., Carbon/Emery Telecom, inc., Central Utah Telephone, Inc., Hanksville Telcom, Inc., Manti Telephone Company, Skyline Telecom and Ubet Telecom, Inc. for Approval of Purchase and Sale of the Various Exchanges and Associated Matters, Docket No. 99-049-65, Report and Order, issued Sep. 6, 2000 at 11 ¶ 21.

<sup>8</sup> The sale would entail the sale of customer accounts and accounts receivable.

<sup>9</sup> The notification was done as part of Qwest's application requesting authority under Section 214(a) of the Communications Act of 1934, 47 U.S.C. § 214(a), and Section 63.71 of the Commission's rules, 47 C.F.R. § 63.71, to discontinue operations in these exchanges. See Attachment A.

their local, local long distance and interexchange carrier services after the transfer.<sup>10</sup>

After the sale has been completed, the Acquiring Companies will contact these customers again with a “welcome” letter by bill insert.<sup>11</sup> In that letter, much of the information that customers have already received will be repeated. In addition, customers will be advised that the transfer may affect their long distance carrier (both intrastate and interstate) and that should they currently use a carrier that is not present in the Acquiring Companies’ switches then an Acquiring Company representative will contact them to coordinate a carrier change at no charge. The letter will also notify each customer of the available intrastate carriers who are willing to provide toll service and that the customer has the right and ability to change their intrastate toll carrier. Customers will also be advised of the following:

The rates charged by the Acquiring Companies will be the same or lower than those charged by Qwest;

There will be no charge for the switch in service from Qwest to the Acquiring Companies; also, the Acquiring Companies shall pay any charges associated with the customer making one change for a period of two billing cycles following the letter;

As the new local and intrastate long distance service provider, the Acquiring Companies will now be responsible for all service issues; and

A customer contact number will be provided for questions.

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<sup>10</sup> The letters advised that there would be one company providing local exchange service and other companies providing long distance service.

### III. SPECIAL CIRCUMSTANCES WARRANT A WAIVER

The Commission has authority to waive a rule if special circumstances warrant a deviation from the general rule and such deviation will serve the public interest.<sup>12</sup> Such circumstances exist here. To the extent the basic sale between Qwest and the Acquiring Companies is ultimately approved as in the public interest, the concomitant action of moving the customers over to the Acquiring Companies is obviously a necessary aspect of realizing that public interest.<sup>13</sup>

In an increasing number of Orders, the Commission (or the Common Carrier Bureau through delegated authority) is finding that granting of similar waivers is in the public interest.<sup>14</sup> As in the cases of these previously-granted waivers, prior

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<sup>11</sup> As did the customer notification letters associated with the Section 214 process, these later customer communications will also advise that separate corporate entities will be providing the local service and the long distance service.

<sup>12</sup> See Wait Radio v. FCC, 418 F.2d at 1159; Northeast Cellular Telephone Co. v. FCC, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

<sup>13</sup> For this reason, Qwest agrees with Global Telecompetition Consultants, Inc. ("GTC") that the Commission should take action regarding its existing carrier-change rules either to generally waive the requirements in those cases where a sale of some portion (or all) of the subscriber base is occurring or amend the rules to render them inapplicable to such sales. See Petition for Rulemaking submitted by GTC on Dec. 30, 1999.

<sup>14</sup> See In the Matter of Sully Buttes Telephone Cooperative, Inc. and Qwest Corporation Joint Petition for Waiver of Definition of "Study Area" Contained in Part 36, Appendix--Glossary of the Commission's Rules; and Sully Buttes Telephone Cooperative, Inc. Petition for Waiver of Sections 61.41(c) and (d) and 69.3(e)(11) of the Commission's Rules, CC Docket No. 96-45, Order, DA 00-1894, rel. Aug. 18, 2000 ("Sully Buttes Order"); In the Matter of Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996, Citizens Utilities Company [and] U S WEST Communications, Inc. Joint Petition for Waiver, CC Docket No. 94-129, Order, DA 00-1584 rel. July 14, 2000; In the Matter of Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; International Exchange Communications, Inc. Request for Waiver, Order, 14 FCC Rcd. 15268, 15269-70 ¶ 4 (1999) (waiver granted

customer notification has already occurred.<sup>15</sup> In addition, a follow-up “welcome” letter will be sent at approximately the same time as the occurrence of the actual transfer.

By granting this Petition, the Commission will ensure that the policy goals of the carrier-change rules are served without compromising the benefits associated with the commercially-reasonable alienation of property and the seamless transition of carriers serving end-user customers in the twelve Utah exchanges. Given that the above outlined circumstances are similar to those in which the Commission has previously granted waivers of its carrier-change rules, Qwest and the Acquiring Companies are confident that the Commission will find the granting of this Petition warranted and in the public interest.

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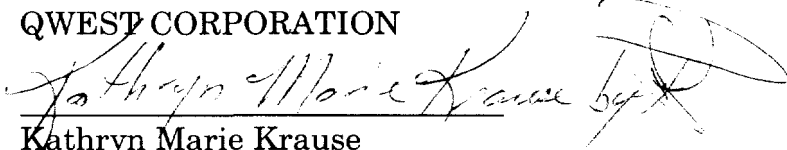
to allow transfer of customer base pursuant to asset purchase agreement with another carrier); and citing to WAIT Radio v. FCC, 418 F.2d at 1159; id. at 15270 ¶ 5 (granting International Exchange Communications, Inc. a waiver in conjunction with the purchase of International Telecommunications Corp.’s assets); In the Matter of Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Iowa Telecommunications Services Petition for Waiver, Order, 14 FCC Rcd. 21319 (1999) (waiver granted to allow Iowa Telecommunications Services (“ITS”) to change the preferred carrier of those consumers currently presubscribed to GTE of the Midwest to ITS); In the Matter of Implementation of Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; MCI WorldCom, Inc. Request for Waiver, Order, 14 FCC Rcd. 12264 (1999) (waiver granted to allow transfer of customer accounts pursuant to purchase agreement with another carrier).

<sup>15</sup> In the Sully Buttes Order, the Commission acted in a manner consistent with the conclusion that a communication occurring between Qwest and their customers as part of the Section 214 process (and in compliance with 47 C.F.R. Section 63.71)

Respectfully submitted,

QWEST CORPORATION

By:

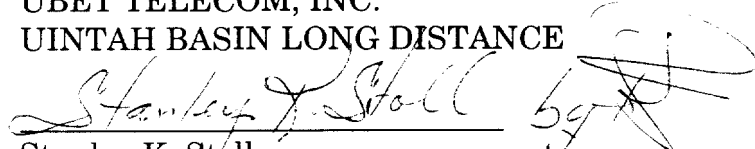
  
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(303) 672-2859

Of Counsel,  
Dan L. Poole

Its Attorney

ALL WEST COMMUNICATIONS, INC.,  
ALL WEST WORLD CONNECT  
CARBON/EMERY TELCOM, INC.,  
CENTRAL TELCOM SERVICES  
CENTRAL UTAH TELEPHONE, INC.,  
EMERY TELCOM  
HANKSVILLE TELCOM, INC.,  
MANTI LONG DISTANCE  
MANTI TELEPHONE COMPANY,  
SKYLINE TELECOM  
UBET TELECOM, INC.  
UINTAH BASIN LONG DISTANCE

By

  
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Salt Lake City, Utah 84101-1609  
(801) 521-7900

Their Attorneys

November 9, 2000

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would be considered sufficient notification for purposes of a carrier-change waiver request. Sully Buttes Order ¶ 7.

## **ATTACHMENT A**



Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Qwest Corporation )  
 )  
Section 63.71 Application to Discontinue )  
Operation of its Telecommunications )  
Facilities Within Twelve Utah )  
Exchanges, Without Impairment )  
or Interruption of Service to the Public )

File No. WPD-\_\_\_\_\_

**SECTION 63.71 APPLICATION**  
**CONCERNING TWELVE UTAH EXCHANGES**

Qwest Corporation ("Qwest")<sup>1</sup> has agreed to transfer to All West Communications, Inc., Carbon/Emery Telcom, Inc., Central Utah Telephone, Inc., Hanksville Telcom, Inc., Manti Telephone Company, Skyline Telecom and UBET Telecom, Inc. (referred to hereinafter collectively as "Acquiring Companies") twelve Utah exchanges. A description of each of the Acquiring Companies, the exchanges being acquired, and the number of access lines in each exchange is set forth in Attachment A. These twelve exchanges collectively serve approximately 35,600 access lines in Utah.

Pursuant to 47 C.F.R. Section 63.71, Qwest requests the Federal Communications Commission ("Commission") to certify that Qwest may

<sup>1</sup> On June 30, 2000, U S WEST, Inc., the parent and sole shareholder of U S WEST Communications, Inc., merged with and into Qwest

transfer to the Acquiring Companies the responsibility for providing interstate services in these exchanges, so that the parties may consummate their sales contract. Qwest is considered the dominant carrier with respect to the services being transferred.

The planned transfer of the exchanges and the associated assets will have no known immediate or substantial effect on the service provided to customers within this exchange. Importantly, no existing service will be discontinued, reduced or impaired as a result of the transfer. In fact, it is anticipated that service will improve over time because the Acquiring Companies have substantial expertise in providing telecommunications services in rural communities, and this experience will ultimately inure to the benefit of telecommunications subscribers within the twelve exchanges. The transfer of these twelve exchanges to the Acquiring Companies is in the public interest.

On December 22, 1999, Qwest and the Acquiring Companies filed a joint application with the Utah Public Service Commission seeking approval for the transfer of these twelve exchanges. On September 6, 2000, the Utah Public Service Commission issued an Order approving the proposed sale of the subject exchanges by Qwest to the Acquiring Companies. In compliance with Section 63.71 of the Commission's rules,<sup>2</sup> one of the letters in

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Communications International Inc. Further, on July 6, 2000, U S WEST Communications, Inc. was renamed Qwest Corporation.


<sup>2</sup> 47 C.F.R. § 63.71.

Attachment B hereto was sent to all affected customers in Utah either on November 3 or November 6, 2000. Concurrent with the filing of this application, notice is also being provided to the Utah Public Service Commission, the Governor of Utah and the U.S. Secretary of Defense. For all of the foregoing reasons, Qwest requests that the Commission expeditiously consider and approve this Section 63.71 application.

Respectfully submitted,

QWEST CORPORATION

By:

  
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Washington, DC 20036  
(303) 672-2887

Its Attorney

Of Counsel,  
Dan L. Poole

November 6, 2000

**ATTACHMENT A**  
**DESCRIPTION OF THE ACQUIRING COMPANY**  
**AND THE EXCHANGES IT IS ACQUIRING**

All West Communications, Inc. ("All West") is a corporation organized under the laws of the state of Utah, with its principal place of business at 50 West 100 North, P.O. Box 588, Kamas, Utah 84036. All West provides local exchange and other telecommunications services within the state of Utah pursuant to certificate of convenience and necessity issued by the Public Service Commission of Utah ("Utah Commission"). All West currently provides public telecommunications services in portions of Rich, Summit and Wasatch counties in the state of Utah.

Carbon/Emery Telcom, Inc ("Carbon/Emery") is a corporation organized under the laws of the state of Utah, with its principal place of business at 455 East Highway 29, P.O. Box 629, Orangeville, Utah 84537. Carbon/Emery is a wholly-owned subsidiary of Emery Telephone, which provides local exchange and other telecommunications services in portions of Emery and Grand, counties in the state of Utah pursuant to a certificate of convenience and necessity issued by the Utah Commission.

Central Utah Telephone, Inc. ("Central Utah") is a corporation organized under the laws of the state of Utah, with its principal place of business at 45 West Center, P.O. Box 7, Fairview, Utah 84629. Central Utah provides local exchange and other telecommunications services within the

state of Utah pursuant to a certificate of convenience and necessity issued by the Utah Commission. Central Utah currently provides public telecommunications services in portions of Carbon, Sanpete, Utah and Wasatch counties in the state of Utah.

Hanksville Telcom, Inc. ("Hanksville") is a corporation organized under the laws of the state of Utah, with its principal place of business at 455 East Highway 29, P.O. Box 629, Orangeville, Utah 84537. Hanksville is a wholly-owned subsidiary of Emery Telephone, which provides local exchange and other telecommunications services in portions of Emery, Grand, Sanpete and Sevier counties in the state of Utah pursuant to a certificate of convenience and necessity issued by the Utah Commission. Emery Telephone has entered into an agreement with Hanksville pursuant to which it is assigning its rights under the Agreement for Purchase and Sale of Telephone Exchanges between Emery Telephone and Qwest to Hanksville.

Manti Telephone Company ("Manti") is a corporation organized under the laws of the state of Utah, with its principal place of business at 40 West Union, Manti, Utah. Manti provides local exchange and other telecommunications services within the state of Utah pursuant to a certificate of convenience and necessity issued by the Utah Commission. Manti currently provides public telecommunications services in a portion of Sanpete County, Utah.

Skyline Telecom ("Skyline") is a corporation organized under the laws of the state of Utah, with its principal place of business at 45 West Center,

P.O. Box 7, Fairview, Utah 84629. Skyline provides local exchange and other telecommunications services within the state of Utah pursuant to a certificate of convenience and necessity issued by the Utah Commission. Skyline currently provides public telecommunications services in portions of Juab, Sanpete and Tooele counties in the state of Utah.

UBET Telecom, Inc. (“UBET”) is a corporation organized under the laws of the state of Utah, with its principal place of business at 3843 South US Highway 40, P.O. Box 398, Roosevelt, Utah 84066. UBET is a wholly-owned subsidiary of Uintah Basin Telecommunications Association, Inc. (“Uintah Basin”), which provides local exchange and other telecommunications services in portions of Duchesne, Uintah and Wasatch counties in the state of Utah pursuant to a certificate of convenience and necessity issued by the Utah Commission. Uintah Basin has entered into an agreement with UBET pursuant to which it is assigning its rights under the Agreement for Purchase and Sale of Telephone Exchanges from Qwest to UBET.

Company/Exchange	CLLI	Lines
<b>All West Communications, Inc.</b> Coalville	CLVLUTMA	1,920
<b>Carbon/Emery Telcom, Inc.</b> East Carbon	ECRCUTMA	978
Helper	HLPRUTMA	1,983
Price	PRICUTMA	9,054
<b>Central Utah Telephone, Inc.</b> Mt Pleasant	MNPLUTMA	2,077
<b>Hanksville Telcom, Inc.</b> Hanksville	HNVLUTNM	170
<b>Manti Telephone Company</b> Ephraim	EPHRUTMA	1,887
<b>Skyline Telecom</b> Dugway	DGWYUTMA	599
Wendover	WNDVUTMA	808
<b>UBET Telecom, Inc.</b> Duchesne	DCHSUTMA	983
Roosevelt	RSVTUTMA	4,443
Vernal	VRNLUTMA	10,735

**ATTACHMENT B**  
**NOTICE TO AFFECTED CUSTOMERS**





## NOTICE OF INTENT TO SELL EXCHANGES

November 3, 2000

Dear Customer:

For more than eight decades Qwest (formerly known as U S WEST) and our predecessor, Mountain Bell, have valued the opportunity to serve you and our other customers in your area. We have worked with you and for you -- in your homes, businesses, schools and governments -- to provide good service to you and your community. Thank you for these opportunities.

Dramatic changes in the telecommunications industry have made it necessary for us to adopt new strategies and approaches. The difficult decision to sell service areas is one measure we've undertaken to strengthen our industry's ability to serve all customers better in the future. This decision also allows us to better meet demands during these competitive times.

Qwest has reached an agreement to sell our facilities serving the communities of East Carbon (area code 435; prefix 888), Helper (area code 435; prefix 472), and Price (area code 435; prefixes 613, 636, and 637) to Carbon/Emery Telcom, Inc., a subsidiary of Emery Telephone. Once this sale is completed Carbon/Emery Telcom will begin providing local telephone service to you and others in your community who were previously served by Qwest.

We are confident that Carbon/Emery Telcom possesses the ability and experience necessary to meet your future telecommunications needs. We are confident, too, that the transfer of service to Carbon/Emery Telcom will be a completely smooth and seamless transaction. Your service -- including your local calling area, your telephone number(s), and Emergency 911 service -- will remain exactly as it is today. Transfer of your service to Carbon/Emery Telcom will be automatic -- you don't have to do anything.

Local basic service, previously provided to you by Qwest, will be provided to you in the future by Carbon/Emery Telcom. If your local long distance provider is Qwest that service will be provided to you in the future by Emery Telcom, a subsidiary of Emery Telephone. If you have any other long distance provider, that company will remain your long distance provider after Carbon/Emery Telcom becomes your basic service provider. No action is necessary on your part. As always, to the extent alternative providers are available and have been authorized, pursuant to applicable law, to provide local basic or local long distance services, you remain free at any time to select the local basic or local long distance provider of your choice.

Sales of this type must be approved by the Federal Communications Commission (FCC) and by the Utah Public Service Commission. On September 6, 2000, the Utah Public Service Commission approved this sale in Docket No. 99-049-65. The FCC will normally authorize this proposed transfer of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object to the FCC, you should file your comments within 30 days after receipt of this notification. Address them to the Federal Communications Commission, Portals II, 445 12th Street SW, Washington, D.C. 20554, referencing the 63.71 application of Qwest. Comments should include specific information about the impact of this proposed transfer upon you or your company, including any inability to acquire reasonable substitute service.

*(please see reverse)*

As we move ahead to transfer your service from Qwest to Carbon/Emery Telcom we will inform you of significant developments. And, until the transition to Carbon/Emery Telcom is complete, Qwest will continue to work diligently to provide service for you and the other members of your community. If you have any questions concerning the sale of exchanges, please call us collect at 801-237-7634 between the hours of 8 a.m. and 5 p.m. Monday through Friday. If you receive a recording when you call, please leave a message and your call back telephone number and we will return your call as soon as possible.

Thank you for your support and business.

Qwest®



## NOTICE OF INTENT TO SELL EXCHANGES

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Dramatic changes in the telecommunications industry have made it necessary for us to adopt new strategies and approaches. The difficult decision to sell service areas is one measure we've undertaken to strengthen our industry's ability to serve all customers better in the future. This decision also allows us to better meet demands during these competitive times.

Qwest has reached an agreement to sell our facilities serving the communities of Duchesne (area code 435; prefix 738), Roosevelt (area code 435; prefixes 722 and 725), and Vernal (area code 435; prefixes 781 and 789) to UBET Telecom, Inc, a subsidiary of Uintah Basin Telecommunications Association. Once this sale is completed UBET Telecom will begin providing local telephone service to you and others in your community who were previously served by Qwest.

We are confident that UBET Telecom possesses the ability and experience necessary to meet your future telecommunications needs. We are confident, too, that the transfer of service to UBET Telecom will be a completely smooth and seamless transaction. Your service -- including your local calling area, your telephone number(s), and Emergency 911 service -- will remain exactly as it is today. Transfer of your service UBET Telecom will be automatic -- you don't have to do anything.

Local basic service, previously provided to you by Qwest, will be provided to you in the future by UBET Telecom. If your local long distance provider is Qwest that service will be provided to you in the future by Uintah Basin Long Distance, a subsidiary of Uintah Basin Telecommunications Association. If you have any other long distance provider, that company will remain your long distance provider after UBET Telecom becomes your basic service provider. No action is necessary on your part. As always, to the extent alternative providers are available and have been authorized, pursuant to applicable law, to provide local basic or local long distance services, you remain free at any time to select the local basic or local long distance provider of your choice.

Sales of this type must be approved by the Federal Communications Commission (FCC) and by the Utah Public Service Commission. On September 6, 2000, the Utah Public Service Commission approved this sale in Docket No. 99-049-65. The FCC will normally authorize this proposed transfer of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object to the FCC, you should file your comments within 30 days after receipt of this notification. Address them to the Federal Communications Commission, Portals II, 445 12th Street SW, Washington, D.C. 20554,

*(please see reverse)*



referencing the 63.71 application of Qwest. Comments should include specific information about the impact of this proposed transfer upon you or your company, including any inability to acquire reasonable substitute service.

As we move ahead to transfer your service from Qwest to UBET Telecom we will inform you of significant developments. And, until the transition to UBET Telecom is complete, Qwest will continue to work diligently to provide service for you and the other members of your community. If you have any questions concerning the sale of exchanges, please call us collect at 801-237-7634 between the hours of 8 a.m. and 5 p.m. Monday through Friday. If you receive a recording when you call, please leave a message and your call back telephone number and we will return your call as soon as possible.

Thank you for your support and business.

Qwest®



## NOTICE OF INTENT TO SELL EXCHANGES

November 6, 2000

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Dramatic changes in the telecommunications industry have made it necessary for us to adopt new strategies and approaches. The difficult decision to sell service areas is one measure we've undertaken to strengthen our industry's ability to serve all customers better in the future. This decision also allows us to better meet demands during these competitive times.

Qwest has reached an agreement to sell our facilities serving Coalville (area code 435; prefix 336) to All West Communications, Inc. Once this sale is completed All West Communications will begin providing local telephone service to you and others in your community who were previously served by Qwest.

We are confident that All West Communications possesses the ability and experience necessary to meet your future telecommunications needs. We are confident, too, that the transfer of service to All West Communications will be a completely smooth and seamless transaction. Your service -- including your local calling area, your telephone number(s), and Emergency 911 service -- will remain exactly as it is today. Transfer of your service to All West Communications will be automatic -- you don't have to do anything.

Local basic service, previously provided to you by Qwest, will be provided to you in the future by All West Communications. If your local long distance provider is Qwest that service will be provided to you in the future by All West World Connect, an affiliate of All West Communications. If you have any other long distance provider, that company will remain your long distance provider after All West Communications becomes your basic service provider. No action is necessary on your part. As always, to the extent alternative providers are available and have been authorized, pursuant to applicable law, to provide local basic or local long distance services, you remain free at any time to select the local basic or local long distance provider of your choice.

Sales of this type must be approved by the Federal Communications Commission (FCC) and by the Utah Public Service Commission. On September 6, 2000, the Utah Public Service Commission approved this sale in Docket No. 99-049-65. The FCC will normally authorize this proposed transfer of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object to the FCC, you should file your comments within 30 days after receipt of this notification. Address them to the Federal Communications Commission, Portals II, 445 12th Street SW, Washington, D.C. 20554, referencing the 63.71 application of Qwest. Comments should include specific information about the impact of this proposed transfer upon you or your company, including any inability to acquire reasonable substitute service.

*(please see reverse)*

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For more than eight decades Qwest (formerly known as U S WEST) and our predecessor, Mountain Bell, have valued the opportunity to serve you and our other customers in your area. We have worked with you and for you -- in your homes, businesses, schools and governments -- to provide good service to you and your community. Thank you for these opportunities.

Dramatic changes in the telecommunications industry have made it necessary for us to adopt new strategies and approaches. The difficult decision to sell service areas is one measure we've undertaken to strengthen our industry's ability to serve all customers better in the future. This decision also allows us to better meet demands during these competitive times.

Qwest has reached an agreement to sell our facilities serving Mt. Pleasant (area code 435; prefix 462) to Central Utah Telephone, Inc. Once this sale is completed Central Utah Telephone will begin providing local telephone service to you and others in your community who were previously served by Qwest.

We are confident that Central Utah Telephone possesses the ability and experience necessary to meet your future telecommunications needs. We are confident, too, that the transfer of service to Central Utah Telephone will be a completely smooth and seamless transaction. Your service -- including your local calling area, your telephone number(s), and Emergency 911 service -- will remain exactly as it is today. Transfer of your service to Central Utah Telephone will be automatic -- you don't have to do anything.

Local basic service, previously provided to you by Qwest, will be provided to you in the future by Central Utah Telephone. If your local long distance provider is Qwest that service will be provided to you in the future by Central Telcom Services, an affiliate of Central Utah Telephone. If you have any other long distance provider, that company will remain your long distance provider after Central Utah Telephone becomes your basic service provider. No action is necessary on your part. As always, to the extent alternative providers are available and have been authorized, pursuant to applicable law, to provide local basic or local long distance services, you remain free at any time to select the local basic or local long distance provider of your choice.

Sales of this type must be approved by the Federal Communications Commission (FCC) and by the Utah Public Service Commission. On September 6, 2000, the Utah Public Service Commission approved this sale in Docket No. 99-049-65. The FCC will normally authorize this proposed transfer of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object to the FCC, you should file your comments within 30 days after receipt of this notification. Address them to the Federal Communications Commission, Portals II, 445 12th Street SW, Washington, D.C. 20554, referencing the 63.71 application of Qwest. Comments should include specific information about the impact of this proposed transfer upon you or your company, including any inability to acquire reasonable substitute service.

*(please see reverse)*



As we move ahead to transfer your service from Qwest to Central Utah Telephone we will inform you of significant developments. And, until the transition to Central Utah Telephone is complete, Qwest will continue to work diligently to provide service for you and the other members of your community. If you have any questions concerning the sale of exchanges, please call collect at 801-237-7634 between the hours of 8 a.m. and 5 p.m. Monday through Friday. If you receive a recording when you call, please leave a message and your call back telephone number and we will return your call as soon as possible.

Thank you for your support and business.

Qwest®





## NOTICE OF INTENT TO SELL EXCHANGES

November 6, 2000

Dear Customer:

For more than eight decades Qwest (formerly known as U S WEST) and our predecessor, Mountain Bell, have valued the opportunity to serve you and our other customers in your area. We have worked with you and for you -- in your homes, businesses, schools and governments -- to provide good service to you and your community. Thank you for these opportunities.

Dramatic changes in the telecommunications industry have made it necessary for us to adopt new strategies and approaches. The difficult decision to sell service areas is one measure we've undertaken to strengthen our industry's ability to serve all customers better in the future. This decision also allows us to better meet demands during these competitive times.

Qwest has reached an agreement to sell our facilities serving Hanksville (area code 435; prefix 542) to Hanksville Telcom, Inc., a subsidiary of Emery Telephone. Once this sale is completed Hanksville Telcom will begin providing local telephone service to you and others in your community who were previously served by Qwest.

We are confident that Hanksville Telcom possesses the ability and experience necessary to meet your future telecommunications needs. We are confident, too, that the transfer of service to Hanksville Telcom will be a completely smooth and seamless transaction. Your service -- including your local calling area, your telephone number(s), and Emergency 911 service -- will remain exactly as it is today. Transfer of your service to Hanksville Telcom will be automatic -- you don't have to do anything.

Local basic service, previously provided to you by Qwest, will be provided to you in the future by Hanksville Telcom. If your local long distance provider is Qwest that service will be provided to you in the future by Emery Telcom, a subsidiary of Emery Telephone. If you have any other long distance provider, that company will remain your long distance provider after Hanksville Telcom becomes your basic service provider. No action is necessary on your part. As always, to the extent alternative providers are available and have been authorized, pursuant to applicable law, to provide local basic or local long distance services, you remain free at any time to select the local basic or local long distance provider of your choice.

Sales of this type must be approved by the Federal Communications Commission (FCC) and by the Utah Public Service Commission. On September 6, 2000, the Utah Public Service Commission approved this sale in Docket No. 99-049-65. The FCC will normally authorize this proposed transfer of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object to the FCC, you should file your comments within 30 days after receipt of this notification. Address them to the Federal Communications Commission, Portals II, 445 12th Street SW, Washington, D.C. 20554, referencing the 63.71 application of Qwest. Comments should include specific information about the impact of this proposed transfer upon you or your company, including any inability to acquire reasonable substitute service.

*(please see reverse)*

As we move ahead to transfer your service from Qwest to Hanksville Telcom we will inform you of significant developments. And, until the transition to Hanksville Telcom is complete, Qwest will continue to work diligently to provide service for you and the other members of your community. If you have any questions concerning the sale of exchanges, please call us collect at 801-237-7634 between the hours of 8 a.m. and 5 p.m. Monday through Friday. If you receive a recording when you call, please leave a message and your call back telephone number and we will return your call as soon as possible.

Thank you for your support and business.

Qwest®



## NOTICE OF INTENT TO SELL EXCHANGES

November 6, 2000

Dear Customer:

For more than eight decades Qwest (formerly known as U S WEST) and our predecessor, Mountain Bell, have valued the opportunity to serve you and our other customers in your area. We have worked with you and for you -- in your homes, businesses, schools and governments -- to provide good service to you and your community. Thank you for these opportunities.

Dramatic changes in the telecommunications industry have made it necessary for us to adopt new strategies and approaches. The difficult decision to sell service areas is one measure we've undertaken to strengthen our industry's ability to serve all customers better in the future. This decision also allows us to better meet demands during these competitive times.

Qwest has reached an agreement to sell our facilities serving Ephraim (area code 435; prefix 283) to Manti Telephone Company. Once this sale is completed Manti Telephone Company will begin providing local telephone service to you and others in your community who were previously served by Qwest.

We are confident that Manti Telephone Company possesses the ability and experience necessary to meet your future telecommunications needs. We are confident, too, that the transfer of service to Manti Telephone Company will be a completely smooth and seamless transaction. Your service -- including your local calling area, your telephone number(s), and Emergency 911 service -- will remain exactly as it is today. Transfer of your service to Manti Telephone Company will be automatic -- you don't have to do anything.

Local basic service, previously provided to you by Qwest, will be provided to you in the future by Manti Telephone Company. If your local long distance provider is Qwest that service will be provided to you in the future by Manti Long Distance, an affiliate of Manti Telephone Company. If you have any other long distance provider, that company will remain your long distance provider after Manti Telephone Company becomes your basic service provider. No action is necessary on your part. As always, to the extent alternative providers are available and have been authorized, pursuant to applicable law, to provide local basic or local long distance services, you remain free at any time to select the local basic or local long distance provider of your choice.

Sales of this type must be approved by the Federal Communications Commission (FCC) and by the Utah Public Service Commission. On September 6, 2000, the Utah Public Service Commission approved this sale in Docket No. 99-049-65. The FCC will normally authorize this proposed transfer of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object to the FCC, you should file your comments within 30 days after receipt of this notification. Address them to the Federal Communications Commission, Portals II, 445 12th Street SW, Washington, D.C. 20554, referencing the 63.71 application of Qwest. Comments should include specific information about the impact of this proposed transfer upon you or your company, including any inability to acquire reasonable substitute service.

*(please see reverse)*

As we move ahead to transfer your service from Qwest to Manti Telephone Company we will inform you of significant developments. And, until the transition to Manti Telephone Company is complete, Qwest will continue to work diligently to provide service for you and the other members of your community. If you have any questions concerning the sale of exchanges, please call us collect at 801-237-7634 the hours of 8 a.m. and 5 p.m. Monday through Friday. If you receive a recording when you call, please leave a message and your call back telephone number and we will return your call as soon as possible.

Thank you for your support and business.

Qwest®



## NOTICE OF INTENT TO SELL EXCHANGES

November 6, 2000

Dear Customer:

For more than eight decades Qwest (formerly known as U S WEST) and our predecessor, Mountain Bell, have valued the opportunity to serve you and our other customers in your area. We have worked with you and for you -- in your homes, businesses, schools and governments -- to provide good service to you and your community. Thank you for these opportunities.

Dramatic changes in the telecommunications industry have made it necessary for us to adopt new strategies and approaches. The difficult decision to sell service areas is one measure we've undertaken to strengthen our industry's ability to serve all customers better in the future. This decision also allows us to better meet demands during these competitive times.

Qwest has reached an agreement to sell our facilities serving the communities of Dugway (area code 435; prefix 831) and Wendover (area code 435; prefix 665) to Skyline Telcom. Once this sale is completed Skyline Telcom will begin providing local telephone service to you and others in your community who were previously served by Qwest.

We are confident that Skyline Telcom possesses the ability and experience necessary to meet your future telecommunications needs. We are confident, too, that the transfer of service to Skyline Telcom will be a completely smooth and seamless transaction. Your service -- including your local calling area, your telephone number(s), and Emergency 911 service -- will remain exactly as it is today. Transfer of your service to Skyline Telcom will be automatic -- you don't have to do anything.

Local basic service, previously provided to you by Qwest, will be provided to you in the future by Skyline Telcom. If your local long distance provider is Qwest that service will be provided to you in the future by Central Telcom Services, an affiliate of Skyline Telcom. If you have any other long distance provider, that company will remain your long distance provider after Skyline Telcom becomes your basic service provider. No action is necessary on your part. As always, to the extent alternative providers are available and have been authorized, pursuant to applicable law, to provide local basic or local long distance services, you remain free at any time to select the local basic or local long distance provider of your choice.

Sales of this type must be approved by the Federal Communications Commission (FCC) and by the Utah Public Service Commission. On September 6, 2000, the Utah Public Service Commission approved this sale in Docket No. 99-049-65. The FCC will normally authorize this proposed transfer of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object to the FCC, you should file your comments within 30 days after receipt of this notification. Address them to the Federal Communications Commission, Portals II, 445 12th Street SW, Washington, D.C. 20554, referencing the 63.71 application of Qwest. Comments should include specific information about the impact of this proposed transfer upon you or your company, including any inability to acquire reasonable substitute service.

*(please see reverse)*


As we move ahead to transfer your service from Qwest to Skyline Telcom we will inform you of significant developments. And, until the transition to Skyline Telcom is complete, Qwest will continue to work diligently to provide service for you and the other members of your community. If you have any questions concerning the sale of exchanges, please call us collect at 801-237-7634 between the hours of 8 a.m. and 5 p.m. Monday through Friday. If you receive a recording when you call, please leave a message and your call back telephone number and we will return your call as soon as possible.

Thank you for your support and business.

Qwest®

## **CERTIFICATE OF SERVICE**

I, Kelseau Powe, Jr., do hereby certify that on this 6<sup>th</sup> day of November, 2000,  
I have caused a copy of the foregoing **SECTION 63.71 APPLICATION**  
**CONCERNING TWELVE UTAH EXCHANGES** to be served, via first class  
United States mail, postage prepaid, upon the persons listed on the attached service  
list.



---

Kelseau Powe, Jr.

---

\*Served via hand delivery

\*Dorothy T. Attwood  
Federal Communications Commission  
Room 5-C345  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

\*L. Charles Keller  
Federal Communications Commission  
Room 6A-207  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

\*Marty Schwimmer  
Federal Communications Commission  
Room 6A-336  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

\*International Transcription  
Services, Inc.  
1231 20<sup>th</sup> Street, N.W.  
Washington, DC 20036

William S. Cohen  
United States Secretary of Defense  
**Attn. Special Assistant for**  
**Telecommunications**  
The Pentagon  
Washington, DC 20301

Stephan F. Mecham  
Utah Public Service Commission  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84111

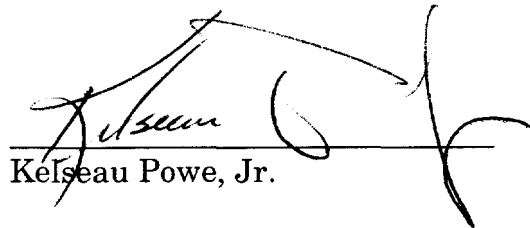
Mike Leavitt  
Governor's Office  
State of Utah  
210 State Capitol  
Salt Lake City, UT 84114

Stanley K. Stoll  
Jerry D. Fenn  
Blackburn & Stoll, L.C.  
Suite 400  
77 West 200 South  
Salt Lake City, UT 84101-1609



## CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on the 9<sup>th</sup> day of November, 2000, I have caused a copy of the foregoing **JOINT PETITION FOR WAIVER OF QWEST CORPORATION, ALL WEST COMMUNICATIONS, INC., ALL WEST WORLD CONNECT, CARBON/EMERY TELCOM, INC., CENTRAL TELCOM SERVICES, CENTRAL UTAH TELEPHONE, INC., EMERY TELCOM, HANKSVILLE TELCOM, INC., MANTI LONG DISTANCE, MANTI TELEPHONE COMPANY, SKYLINE TELECOM, UBET TELECOM, INC. AND UINTAH BASIN LONG DISTANCE** to be served, via first class United States mail, postage prepaid, upon the persons listed on the attached service list.



Kelseau Powe, Jr.

---

\*Served via hand delivery

\*Lawrence E. Strickling  
Federal Communications Commission  
Room 5-C345  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

\*L. Charles Keller  
Federal Communications Commission  
Room 6-A207  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

\*Irene Flannery  
Federal Communications Commission  
Room 5-C345  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

\*Sheryl Todd  
Federal Communications Commission  
Room 5-B540  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

\*Marty Schwimmer  
Federal Communications Commission  
Room 6-A336  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

\*Al McCloud  
Federal Communications Commission  
Room 6-A320  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

\*Adrian Wright  
Federal Communications Commission  
Room 5-B540  
Portals II  
445 12<sup>th</sup> Street, S.W.  
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\*Kenneth P. Moran  
Federal Communications Commission  
Room 6-B201  
Portals II  
445 12<sup>th</sup> Street, S.W.  
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\*Katherine Schroder  
Federal Communications Commission  
5<sup>th</sup> Floor  
Portals II  
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Washington, DC 20554

\*Jon Bernstein  
Federal Communications Commission  
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Washington, DC 20554

\*Jane E. Jackson  
Federal Communications Commission  
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445 12<sup>th</sup> Street, S.W.  
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Services, Inc.  
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Mike Leavitt  
Governor's Office  
State of Utah  
210 State Capitol  
Salt Lake City, UT 84114

Stephan F. Mecham  
Utah Public Service Commission  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84111

Stanley K. Stoll  
Jerry D. Fenn  
Blackburn & Stoll, L.C.  
Suite 400  
77 West 200 South  
Salt Lake City, UT 84101-1609

ACQUIRING COMPANIES

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Last Update: 10/11/2000